



**EPA REGION 6
AIR INSPECTION REPORT**

FRS #: 110000504268 Inspection Dates: **October 10-12, 2012**
AFS #: 48-201-00153
Type of inspection: Clean Air Act, Partial Compliance Evaluation
Company Name: **INTERCONTINENTAL TERMINALS COMPANY LLC**
Facility Name: **INTERCONTINENTAL TERMINALS DEER PARK TERMINAL**
Physical Location: 1943 Independence Parkway South (also known as Battleground Road)
Deer Park, Texas 77536
Mailing Address: P.O. Box 698
Deer Park, Texas 77536-0698
County/Parish: **Harris County**
Reg. Programs: **SIP, Title V, MACT, NESHAP, and NSPS**
SIC Code: 4226 and 4953

Facility Representatives:

Michael J. Gaudet	Environmental Compliance Manager	281-884-0360
Carl Holley	VP, Safety, Health, & Environmental Security & Regulatory Compliance	281-884-0350
Mike Vanegas	Safety Specialist	281-884-0354
Bob Pennacchi, PE	Sr. VP Operations	281-884-0239
Mark Jeansonne	Chief Financial Officer	281-884-0312

EPA Inspectors:

Daniel Hoyt	6EN-AS	Env. Engineer	214-665-7326
Cary Secrest	HQ-OECA	Env. Scientist	202-564-8661

Enforcement Officer:

Daniel Hoyt, Environmental Engineer (Date)

EPA Inspector:

Daniel Hoyt, Environmental Engineer (Date)

Reviewed By:

Margaret Osbourne, Environmental Scientist (Date)

Executive Summary:

This inspection report is comprised of four sections:

- **Section I – Introduction** includes the following topics:
 - purpose of the inspection,
 - facility description,
 - maps of the facility and detailed process descriptions (These are referenced in designated ATTACHMENTS.)
- **Section II – Regulatory Background** provides information on
 - Permit history
 - regulatory compliance history
 - regulatory applicability
- **Section III – Compliance Status** details the facility's compliance status with applicable
 - EPA regulations,
 - Texas Commission on Environmental Quality (TCEQ) regulations,
 - Air Permit special provisions and
 - Administrative orders.
- **Section IV - Areas of Concern.** The issues stated in Section IV in this report were identified during the time of this inspection and do not preclude any further enforcement document review, legal review or further enforcement action.

Areas of concern (abbreviated):

1. Emissions from internal floating roof (IFR) Tanks 80-2, 80-7, 80-20 and 80-25 at Intercontinental Terminals Company LLC, Deer Park Terminal (ITC Deer Park) may exceed the tanks' volatile organic compounds (VOC) emissions limits or permit application representations of Permit 1078. The tanks are subject to inspection and maintenance requirements under 30 TAC, Chapter 115, 40 CFR Part 60, Subparts A and Kb (Tank 80-25), 40 CFR Part 60, Subparts A and Ka (Tank 80-20), 40 CFR Part 60, Subparts A and K (Tanks 80-2 and 80-7), and 40 CFR Part 63, Subparts A and EEEE.
2. Emissions from fixed roof tank 60-3 may exceed the federally enforceable certified VOC emissions representations of Permit By Rule (PBR) Registration No. 95093.
3. Emissions from fixed roof tanks 80-9, 80-12, 160-1, 160-2 and 160-3 may exceed the VOC limits or permit application representations of Permit 1078.

Section I - INTRODUCTION

PURPOSE OF THE INSPECTION

The inspection team, including me, EPA Region 6 inspector Daniel Hoyt, and EPA Office of Enforcement and Compliance Assistance, Air Enforcement Division inspector Cary Secrest arrived at ITC Deer Park at 9:50 am on October 10, 2012, for an unannounced inspection. We met with Michael J. Gaudet, Cary Secrest presented his credentials, and I presented my EPA identification. Cary Secrest informed Mr. Gaudet that this was an EPA inspection to determine compliance with the Clean Air Act (CAA), that the scope of the inspection was a partial compliance evaluation (PCE) and included evaluation of the compliance of the facility with applicable CAA regulations, including Title V operating permit requirements and Texas State Implementation Plan (SIP) regulations. The objective was to systematically evaluate storage tanks, especially internal floating roof (IFR) tanks, and other sources using an infrared (IR) camera for optical gas imaging and photo-ionization detectors (PID), detecting and identifying emissions sources for further investigation. The inspection was prompted by an analysis of stationary air monitoring data that I conducted, which indicated a significant air emissions source of benzene was located at or near the ITC Deer Park facility.

During the entry meeting a tank inventory list (see Attachment 1) and plot plans (see Attachment 2), were provided by Mr. Gaudet. Cary Secrest also informed Mr. Gaudet that if any documents provided during the inspection contain confidential business information (CBI), those documents should be marked as confidential, and that EPA will follow CBI requirements with respect to handling, storage and access to those documents. We watched a safety video and were introduced to Mike Vanegas who was identified as our primary escort while conducting the field portion of the inspection.

FACILITY DESCRIPTION

A CAA Section 114 information request from EPA Region 6, included as Attachment 3, was received by ITC Deer Park on September 4, 2012. The ITC response, dated October 4 and November 1, 2012 is included as Attachment 4. Attachment 4 includes a detailed process description and process flow diagrams as electronic files stored on a compact disk, which were used to prepare the following brief process description.

The ITC Deer Park facility is a for-hire bulk liquid storage terminal. The site was originally constructed in 1971 and it currently consists of 231 large aboveground storage tanks, tank truck and railcar transfer racks, docks and associated control devices (flares and thermal oxidizers). Products stored and transferred include chemicals, petrochemicals, oils, liquefied petroleum gas (LPG), and petroleum derived liquid products. Products are transferred into and out of the tanks via all modes of transportation, including tank trucks, railcars, barges, ships and pipelines. The ITC Deer Park Facility operates 24 hours per day and currently employs 220 full time employees. Intercontinental Terminals Company LLC is a subsidiary of Mitsui & Co. (USA), Inc. according to the Mitsui website ([[HYPERLINK "http://www.mitsui.com/us/en/business/1197064_3596.html"](http://www.mitsui.com/us/en/business/1197064_3596.html)]). The Dun & Bradstreet reports and Texas Secretary of State corporation information are included as Attachment 5.

Section II – REGULATORY BACKGROUND

PERMIT HISTORY

I reviewed the ITC Deer Park permit history using the response to the 114 CAA information request and documents available through the publically available TCEQ permit document server ([HYPERLINK "<https://webmail.tceq.state.tx.us/gw/webpub>"]. The TCEQ authorized operation of the facilities using Permit by Rule (PBR) regulations and permits issued to Intercontinental Terminals Company LLC, Deer Park Terminal.

Permit No. 1078 authorizes ITC Deer Park to store, load and unload liquids from pipelines, ships, barges, trucks and railcars. The permit requires chemicals listed in permit Attachment B-2 to be stored in IFR tanks and new chemicals can be added without permit amendment if the requirements of Special Condition (SC) 8 are complied with. ITC storage tanks identified in Permit 1078 are cumulatively limited to no more than 159.2 TPY of VOC emissions and 38.7 TPY of VOC for roof landings.

The most recent permit modification was an alteration dated January 30, 2012, to renumber 24 tanks listed in the permit maximum allowable emission rate table (MAERT), Attachments A.1 and A.2. The permit was amended on November 19, 2008, per commitments to TCEQ's thermal imaging findings initiative (i.e., "find & fix"), ITC Deer Park applied to amend its permit to authorize tank roof landing emissions. Special conditions for general tank roof landing operations, design and abatement requirements for existing tanks, operational restrictions for protective off-property effects and de-gassing operations were added to the permit with this amendment. The permit was altered on July 22, 2007 to allow the use of bolted aluminum instead of a welded steel decks for Tanks 35-14 and 100-31. The permit was amended on August 15, 2005 providing authority to construct additional storage tanks, rail, truck, barge and ship loading facilities, modifying LPG fugitive monitoring requirements, and updating fugitive component counts and associated emissions estimates. The permit was most recently renewed on January 29, 2004.

The authorizations and limitations of the tanks, for which an area of concern is documented by Section IV of this report, are as follows: Fixed Roof Tank 60-3 is authorized by PBR Registration No. 95093 dated March 22, 2011 (30 TAC 106.261), with certified representations for change of service to Fuel Oil No. 6 at 125 degrees F, annual emission rate limit of 0.595 TPY VOC, maximum filling rate of 5,330 bbls/hr, hourly emissions rate limit of 5.874 lb/hr VOC during filling, and insignificant breathing losses. IFR Tanks 80-2, 80-7, 80-9, 80-12, 80-20 and 80-25 are authorized by Permit 1078 with MAERT limits for each tank at 162.51 lb/hr VOC, during roof landings. Fixed Roof Tanks 160-1, 160-2 and 160-3 are authorized by Permit 1078 with MAERT limits for each tank at 232.15 lbs/hr.

Federal Operating Permit No. O-01061 compiles all federally enforceable CAA requirements applicable to ITC Deer Park. It was initially issued on March 7, 2003 and renewed October 14, 2008. The permit, as revised, was issued August 15, 2011. The revision updated applicable requirements for two thermal oxidizers, Units TO-1 and TO-2 under 30 TAC, Chapter 115, HRVOC, and updated the CAM deviation limits to represent decreased combustion temperatures based upon updated performance tests.

ENFORCEMENT HISTORY

I reviewed the ITC Deer Park enforcement history for the period 2007-2012, which is summarized below, using documents available through the publically available TCEQ order document server ([HYPERLINK "<http://www2.tceq.texas.gov/epic/eenf/>"]). From 2007 to 2012 TCEQ issued three Agreed Orders with penalties to ITC Deer Park and one court order was issued. The court order, effective date August 8, 2008, Harris County Docket No. 2007-28175, was for a spill to a county ditch and unauthorized emissions of pygas, including benzene, toluene, styrene and other VOC. The agreed orders include: Agreed Order, Docket No. 2009-0500-AIR-E, effective October 7, 2009, Agreed Order, Docket No. 2010-0065-AIR-E, effective August 25, 2010 and Agreed Order, Docket No. 2010-0632-AIR-E, effective October 15, 2010.

A violation documented by Agreed Order, Docket No. 2009-1347-AIR-E that could be related to the areas of concern noted in Section IV of this report include failing to prevent 6,745 pounds of unauthorized 1,3-butadiene emissions from Tank 50-2, caused by excess pressure and the tank's relief valve lifting.

A violations documented by Agreed Order, Docket No. 2010-0065-AIR-E that could be related to the areas of concern noted in Section IV of this report include failing to prevent unauthorized toluene emissions when a railcar was over-filled.

A violation documented by Agreed Order, Docket No. 2010-0632-AIR-E that could be related to the areas of concern noted in Section IV of this report include failing to keep the IFR of Tank 35-5 floating on the liquid surface of the stored material resulting in 2,311 pounds of isoprene emissions.

I reviewed the ITC complaint history using documents available through the publically available TCEQ complaint information system ([HYPERLINK "<http://www2.tceq.texas.gov/oce/waci/>"]).

The only investigated complaints in the system were three complaints alleged against ITC Deer Park from May 2009 to February 2010 alleging that ITC Deer Park failed to properly degas tanks. TCEQ investigated and issued a Notice of Violation for: Failure to calibrate VOC analyzer prior to reading VOC concentrations after tank degassing; failure to quantify VOC emissions during tank degassing; failure to pass two times the vapor space of the tank being degassed through the vapor control device prior to sampling for VOC concentration; failure to keep various records; and failure to meet required VOC destruction efficiency.

REGULATORY APPLICABILITY

The following table provides information on federally enforceable regulations that are potentially applicable to ITC Deer Park, both state (SIP) and federal. The regulations in the table below are considered to be potentially applicable based on a review of Federal Operating Permit No. O-01068. Emissions sources associated with areas of concern documented in Section IV of this report are specifically identified as Applicable Emissions Sources.

Intercontinental Terminals Company LLC
Deer Park Terminal
FY 2013 Inspection – SECTION II

Regulation	Applicable Emissions Sources
40 CFR Part 60, Subparts A and K (Storage Vessels for Petroleum Liquids, Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978)	Tanks: 80-2, 80-7, 80-9 and 80-12
40 CFR Part 60, Subparts A and Ka (Storage Vessels for Petroleum Liquids, Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984)	Tanks: 80-20, 160-1, 160-2 and 160-3
40 CFR Part 60, Subparts A and Kb (Volatile Organic Liquid Storage Vessels, Construction, Reconstruction, or Modification Commenced After July 23, 1984)	Tanks: 60-3 and 80-25
40 CFR Part 61, Subparts A and V (Equipment Leaks, Fugitive Emission Sources)	Fugitive Leaks: FUG-M
40 CFR Part 61, Subparts A and Y (Benzene Storage Vessels)	Tanks: 80-2, 80-7, 80-20 and 80-25
40 CFR Part 61, Subparts A and BB (Benzene Transfer Operations)	Tank Truck/Rail Car Racks Ship Docks Barge Docks
40 CFR Part 63, Subparts A and EEEE (Organic Liquids Distribution, Non-Gasoline)	Tanks: 80-2, 80-7, 80-20 and 80-25
30 TAC Chapter 115, Subchapter C, Division 1 (Loading and Unloading of VOC)	Tank Truck/Rail Car Racks Ship Docks Barge Docks
30 TAC Chapter 115, Subchapter B, Division 1 (Storage of VOC) and Subchapter F, Division 3 (Degassing of Storage Tanks, Transport Vessels, and Marine Vessels)	Tanks: 60-3, 80-2, 80-7, 80-9, 80-12, 80-20, 80-25, 160-1, 160-2 and 160-3
30 TAC Chapter 115, Subchapter D, Division 3 (Pet. Refinery & Petrochemicals)	Fugitive Leaks: FUG-M

Section III – COMPLIANCE REVIEW

This section is organized by plant area/source type for sources and areas that were identified during the comprehensive site-wide PID/IR camera survey. Video and image files referenced below, a spreadsheet file with all PID data collected during the inspection (ITC PID Master File 10 15 to 10 19 2012), and a summary spreadsheet file (Master Log of Data ITC) are included on a compact disk as Attachment 6. Attachment 7 presents the one photo that was taken during the inspection.

The inspection team conducted emissions surveys using the following equipment:

- IR camera manufactured by FLIR, Model GF320, Serial Number 4444009966. The optical gas imaging IR camera surveys of emissions sources were each conducted first in high sensitivity mode (HSM) for screening purposes, and then in full automatic mode (auto). Tanks with emissions visible using the IR camera in both HSM and auto were identified for follow up, so that additional information can be requested.
- PID manufactured by Ion Science, PhoCheck Tiger, Serial Number T-106291 with a 10.6 eV lamp. This PID was calibrated with isobutylene, and is capable of detecting VOC down to around 1 ppb, depending on the gas.
- PID manufactured by Ion Science, PhoCheck Tiger Select, Serial Number T-106544, 10.6 eV lamp. This PID's lamp is equipped with a 10.0 eV glass filter that reduces the lamp output to 10.0 eV. This PID can be operated with a pre-filter tube to detect benzene-specific emissions. This PID was calibrated with benzene, and is capable of detecting benzene down to around 10 ppb.

The PID calibration records, for the most recent calibration prior to the inspection, as well as the records for the post-inspection calibration check, are included as Attachment 8.

Car and I targeted the largest IRF tanks for the PID/IR camera survey. The following table lists the tanks that were observed and had IR camera visible emissions in HSM and auto, which is an indication of a potential problem with the tanks:

Tank	Date, Time of Observation (Video File Name)	Fixed Roof or IFR Seal Type	Contents (True VOC Vapor Pressure)	Capacity (Barrels)	Year of Construction
60-3	10/10/12, 15:13 (MOV_0424)	Fixed Roof	Fuel Oil Blend Stock (0.2 psi @ 130F)	60,000	1992
80-2	10/10/12, 15:39 (MOV_0426)	Mechanical shoe w/secondary wiper	Ethanol, 190-192.5 Proof (1.48 psi @ 80F)	80,000	1976
80-7	10/10/12, 16:06 (MOV_0431)	Double wiper – vapor mounted	Pyrolysis Gasoline (3.60 psi @ 80F)	80,000	1977
80-9	10/10/12, 16:00 (MOV_430)	Fixed Roof	No. 6 Fuel Oil (0.32 psi @ 130F)	80,000	1977

Intercontinental Terminals Company LLC
Deer Park Terminal
FY 2013 Inspection – SECTION III

Tank	Date, Time of Observation (Video File Name)	Fixed Roof or IFR Seal Type	Contents (True VOC Vapor Pressure)	Capacity (Barrels)	Year of Construction
80-12	10/11/12, 9:44 (MOV_0433) and 9:47 (MOV_0434)	Fixed Roof	No. 6 Fuel Oil (0.21 psi @ 116F)	80,000	1977
80-20	10/10/12, 14:41 (MOV_0423)	Mechanical shoe w/secondary wiper	Pyrolysis Gasoline (5.8 psi @ 80F)	80,000	1979
80-25	10/11/12, 11:21 (MOV_0435) and 11:34 (MOV_0436)	Mechanical shoe w/secondary wiper	Methanol (2.75 psi @80F)	80,000	1991
160-1	10/12/12, 14:02 (MOV_0442)	Fixed Roof	Fuel Oil Blend Stock (0.18 psi @ 109F)	160,000	1980
160-2	10/12/12, 14:06 (MOV_0443)	Fixed Roof	Fuel Oil Blend Stock (0.06 psi @ 130F)	160,000	1980
160-3	10/12/12, 14:06 (MOV_0443)	Fixed Roof	Fuel Oil Blend Stock 0.16 psi @ 120F)	160,000	1980

A list of all tanks and other emissions sources that were observed during the IR camera/PID survey, including inspection observations, PID survey times, IR camera video and image file names, and information about each observed tank is included as Attachment 9. Cary conducted the IR camera monitoring and I conducted the PID monitoring. Attachment 10 is the response from ITC Deer Park after the inspection, received October 29, 2012, which includes VOC vapor pressure analysis results and the records for the most recent external and internal IFR tanks inspections (as applicable), for the above noted tanks. I detected elevated PID readings downwind from Tanks 80-7, 80-9 on October 10, 2012. An IR camera photo taken by Cary and included as Attachment 7 shows emissions detected in auto coming from a vent on the roof of Tank 80-9.

Section IV - AREAS OF CONCERN

1. IR camera imaging of IFR Tanks 80-2, 80-7, 80-20 and 80-25 at ITC Deer Park indicates that the tanks' emissions may not be consistent with the limits or permit application representations of Permit 1078. The tanks were not being filled or drawn down and the tank's floating roofs were not landed or in the process of being landed or refloated during the IR camera imaging. The hourly emissions limitation for these tanks in the maximum allowable emissions rate table of Permit 1078 is for tank roof landings and/or working loss emissions. Permit 1078 application emissions representations for IFR Tanks 80-2 (ethanol), 80-7 (pyrolysis gasoline), 80-20 (pyrolysis gasoline) and 80-25 (methanol), for normal standing losses were included in permit application materials dated June 4, 2007 (see Attachment 11). The representations indicate the maximum normal standing losses for 31 IFR tanks with a 80,000 to 100,000 barrel capacity in methanol service is 5.922 lbs/hr, or around 0.19 lbs/hr per tank. The representations indicate the maximum normal standing losses for 31 IFR tanks with a 80,000 to 100,000 barrel capacity in ethanol service is 3.703 lbs/hr, or around 0.12 lbs/hr per tank. The representations indicate the maximum normal standing losses for 8 IFR tanks with a 80,000 to 100,000 barrel capacity in pyrolysis gasoline service is 5.336 lbs/hr, or around 0.67 lbs/hr per tank. Exceeding permit application emissions representations would be a violation of 30 TAC §116.116(b)(1)(C).

The IR camera imaging also indicates that the IFR tanks may not be adequately inspected or maintained under 30 TAC, Chapter 115, 40 CFR Part 60, Subparts A and Kb (Tank 80-25), 40 CFR Part 60, Subparts A and Ka (Tank 80-20), 40 CFR Part 60, Subparts A and K (Tanks 80-2 and 80-7), or 40 CFR Part 63, Subparts A and EEEE. Attachment 10 indicates these four tanks all had recent external seal inspections, no more than two months prior to the date this inspection was conducted. The only issues identified during those external seal inspections were for Tank 80-20 (1/2 inch gap along 12 feet of the secondary seal) and Tank 80-7, which had liquid product accumulated "around the gage well from run off while sampling." No internal seal inspection records for Tanks 80-2, 80-7 and 80-20 were provided and the internal seal inspection record for Tank 80-25 indicated the seals were in compliant condition. Internal API tank inspection records were provided for all four tanks, which all occurred no more than three years prior to the date of this inspection, and numerous deficiencies were noted in the API tank inspection reports. The most recent internal seal inspection records for tanks 80-2, 80-7 and 80-20, and documentation regarding correction of API tank inspection deficiencies should be requested.

2. IR camera imaging of fixed roof tank 60-3 indicates that the tank's emissions may not be consistent with the federally enforceable certified emissions representations of PBR Registration No. 95093. The tank was not being filled or drawn down during the IR camera imaging. PBR registration representations dated February 21, 2011, for PBR Registration No. 95093, indicate breathing loss from this tank is insignificant and the breathing loss emissions representations were not quantified (see Attachment 12). Attachment 10 indicates the contents of this tank, fuel oil blend stock was sampled for true vapor pressure testing, and the results indicate the true VOC vapor pressure, at 130F, was 0.20 psi, less than 0.5 psi, which is the maximum allowed for fixed roof 60,000 barrel tanks without vent controls. The location in the tank where the sample was taken should be requested, since a sample collected from the bottom of a tank may not be consistent with the material near the top of

the tank. Failing to adhere to certified PBR emissions representations would be a violation of 30 TAC §106.6, if the change resulted in an increase in the discharge of emissions.

3. IR camera imaging of fixed roof tanks 80-9, 80-12, 160-1, 160-2 and 160-3 indicates that the tanks' emissions may not be consistent with the VOC limits or permit application representations of Permit 1078. The tanks were not being filled or drawn down during the IR camera imaging. The hourly emissions limitation for these tanks in the maximum allowable emissions rate table of Permit 1078 is for tank working loss emissions. Permit 1078 application emissions representations dated September 29, 2004 for normal breathing losses from 37 fixed roof tanks in No. 6 fuel oil service is 0.468 lbs/hr (see Attachment 13). The representations indicate the maximum normal No. 6 fuel oil breathing losses is for a storage scenario that includes 12 fixed roof tanks with a 80,000 to 100,000 barrel capacity in service, and no fixed roof tanks with a 160,000 barrel capacity. A follow up clarification from ITC Deer Park should be requested about how storage of No. 6 fuel oil is authorized in 160,000 barrel fixed roof tanks. Attachment 10 indicates that the true VOC vapor pressures for the materials stored in these tanks was less than 0.5 psi, which is the maximum allowed without vent controls for fixed roof tanks with an 80,000 or 160,000 barrel capacity. The location in the tanks where the samples were taken should be requested, since a sample collected from the bottom of a tank may not be consistent with the material near the top of the tank. Exceeding permit application emissions representations would be a violation of 30 TAC §116.116(b)(1)(C).

Attachments

1. Tank Inventory Lists Provided October 10, 2012
2. Site Plot Plans
3. CAA Section 114 Information Request
4. ITC Response to CAA Section 114 Information Request Dated October 4, 2012 and November 1, 2012
5. Dun & Bradstreet Reports and Texas Secretary of State Corporation Information
6. Compact Disk with Video and Image Files, Spreadsheet File with all PID data collected during the inspection (ITC PID Master File 10 10 to 10 12 2012), and a summary spreadsheet file (Master Log of Data ITC)
7. Photo Log
8. PID Calibration Records
9. ITC Inspection Master Log of Data and Inspection Observations
10. ITC Response to Information Requested During Inspection
11. Permit 1078 Application IFR Tank Emissions Representations Dated June 4, 2007
12. PBR Registration Representations Dated February 21, 2011, PBR Registration No. 95093
13. Permit 1078 Application Fixed Roof Tank Emissions Representations Dated September 29, 2004

Intercontinental Terminals Company LLC
Deer Park Terminal
FY 2013 Inspection – ATTACHMENT 5

TEXAS SECRETARY OF STATE CORPORATE ENTITY INFORMATION

Entity Information: **INTERCONTINENTAL TERMINALS COMPANY LLC**
PO BOX 698
DEER PARK, TX 77536-0698

Status: IN GOOD STANDING NOT FOR DISSOLUTION OR WITHDRAWAL
through May 15, 2013

Registered Agent: C T CORPORATION SYSTEM
350 N. ST. PAUL ST. STE. 2900
DALLAS, TX 75201

Registered Agent
Resignation Date:

State of Formation: DE

File Number: 0800797340

SOS Registration Date: March 30, 2007

Taxpayer Number: 17417104225

DIRECTOR **BERNT NETLAND**
1943 INDEPENDENCE PARKWAY
LA PORTE , TX 77571

CHIEF EXEC **BERNT NETLAND**
1943 INDEPENDENCE PARKWAY
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Intercontinental Terminals Company LLC
Deer Park Terminal
FY 2013 Inspection – ATTACHMENT 13
P-PIT AND TANKS 501 AND 503 AREA AERIAL IMAGE

Photo 1

Tank 80-9, IR Image Showing Emission in Automatic Mode from Vent on Roof of Insulated Tank. Picture taken by Cary Secrest at 15:58 on October 10, 2012 (IR_0429).

